



IDAHO TRANSPORTATION DEPARTMENT

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April 13, 2012

Ms. Julie Congdon
NPDES Compliance Unit
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900 (M\ S OCE-133)
Seattle, Washington 98101

Re: Responses to EPA Inspection of ITD D1 MS4

Dear Ms. Congdon:

Thank you for your March 14, 2012 letter regarding the results of EPA's inspection of the Idaho Transportation Department District 1's (ITD D1) MS4 on September 16, 2011. In this letter, I will discuss ITD's response to the concerns identified in your letter in the general order in which they appear.

Violations

- 1) EPA's inspection identified the following problems with the ITD D1 MS4 map: catch basins and manholes located within the City of Coeur d'Alene's MS4 jurisdiction were not adequately labeled as such; and the map did not accurately reflect the locations and names of sampling points within the system. We have revised the ITD D1 MS4 map to remove any catch basins and manholes that are not within the ITD's MS4. We have also improved the labels at each of the active sampling points to identify distinct station names that will be used to identify sample stations from this point forward. We would like to point out that the MS4 Permit only requires monitoring at the MS4 outlet located in French Gulch or Fernan Creek. The required MS4 outlet point has always been sampled within the open ditch at the downstream side of Sherman Avenue box culvert. The stormwater drainage that passes by this point is characteristic of the I-90 stormwater system (ITD's MS4) along with stormwater flows from multiple drainage areas within the City's jurisdiction, and all of the drainage from French Gulch. We will continue to monitor stormwater at this location for the duration of the MS4 Permit period and will refer to this location as the MS4 outlet, below the Sherman Avenue Interchange.

Please note, we have voluntarily monitored other upstream locations within the drainage area in order to better understand the relative differences in pollutant concentrations and loads coming from some of the major interconnection points that drain from the City's jurisdictional area. Since the

beginning of our monitoring efforts, some of these locations and the names and numbers used to describe them, have been revised and improved in response to on-the-ground observations of flow volumes and channel conditions within the system. While we feel we have currently arrived at a consistent sampling network and naming system, we may continue to add or delete sampling point locations upstream from our required outlet location where and when appropriate. A copy of the revised map has been enclosed for you review and has been updated on the ITD website.

- 2) EPA has stated that ITD has not developed an information management database system to track the ITD D1 MS4 Illicit Discharge Detection and Elimination (IDDE) program. Up to this point, ITD has simply addressed the results of our IDDE efforts within the context of the MS4 Annual Reports. Because this level of documentation is apparently not sufficient, we have developed a single spreadsheet where all of the MS4 monitoring results and tracking information will be maintained and displayed on an ongoing basis. This MS4 compliance monitoring spreadsheet resides in the District's MS4 file folder and has been copied to the MS4 section of the ITD website for viewing. The spreadsheet will be updated at least annually in conjunction with the MS4 Annual Report cycle. All aspects of MS4 compliance monitoring are tracked and recorded in the spreadsheet, including records and results from our IDDE efforts, public information requests and complaints, water quality monitoring data, MS4 operation and maintenance records and any other pertinent compliance monitoring data. The spreadsheet will be periodically updated and referenced (included) in the MS4 Annual Reports. A provisional version of this spreadsheet will be transmitted to you via email for your review.
- 3) EPA noted that temperature data was not included with the laboratory results provided with the MS4 Annual Report. As noted in your letter, ITD recorded temperature in the field book during sampling events but failed to include these data with the MS4 Annual Report. ITD has corrected this discrepancy by transferring the temperature data from the field book to the MS4 compliance monitoring spreadsheet (described above).
- 4) EPA noted that ITD has submitted past MS4 Annual Reports to the EPA Permits Unit, not the EPA Compliance Unit as required by the MS4 Permit. ITD will correct this discrepancy with subsequent submittals of MS4 compliance information.

Areas of Concern

- 1) EPA noted a lack of information in ITD's compliance file to demonstrate how ITD is addressing potential negative impacts from the use of salt in road deicing operations, as required by Part II.B.6.a. We appreciate this comment and would like to offer some information regarding ITD's efforts to

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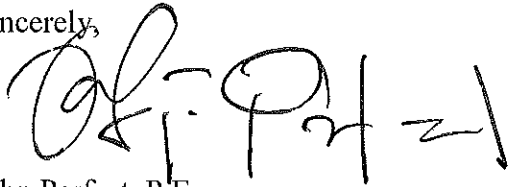
monitor deicer (salt) content in highway stormwater drainage. The most notable monitoring effort to date was a collaborative monitoring effort with IDEQ to document chloride levels in Cedar Creek and 4th of July Creek (I-90, 4th of July Pass drainage). While the 4th of July study area is not specifically within the MS4 boundaries in Coeur d'Alene, the results can be used to generally understand the influence of highway deicing operations on adjacent water bodies. The monitoring period for the 4th of July Pass study has now ended and IDEQ has produced a study report, which is enclosed for your information.

Also, ITD previously included chloride tests in several sampling events that were conducted prior to the effective date of the MS4 Permit monitoring requirement. Chloride was not included as a required parameter in the MS4 Permit; therefore we have not tested for it in the most recent sampling events. In response to EPA's comment regarding potential deicer impact, we plan to resume chloride testing in all subsequent sampling events within the MS4 area. To date, the chloride levels that have been detected in highway stormwater drainage do not appear to cause a water quality problem or otherwise exceed any known threshold of concern for chloride.

- 2) EPA recommends that ITD develop a system to track MS4 inspection data as a means of documenting how well the system is functioning, what areas need maintenance, where problems may be emerging and other factors in the management of the MS4. ITD has addressed this recommendation by developing an MS4 inspection log sheet within the compliance monitoring spreadsheet described above.

Thanks again for conducting an inspection of ITD D1's MS4. I hope you find our response to your concerns satisfactory. Please feel free to call me at 208-772-1224 if you have any questions or concerns regarding this response.

Sincerely,

A handwritten signature in black ink, appearing to read "John Perfect", followed by a stylized flourish.

John Perfect, P.E.

Enclosure: Updated ITD D1 MS4 Map
DEQ Report